

May 6, 2019

The Honorable Kevin K. McAleenan
Acting Secretary
U.S. Department of Homeland Security
300 7th Street SW
Washington, DC 20528

Dear Acting Secretary McAleenan,

The American Association of Port Authorities (AAPA) is extremely concerned by the Department of Homeland Security's recent temporary redeployment of U.S. Customs and Border Protection (CBP) staff from seaports and regions, where staffing for passenger and freight facilitation are already under resourced. These redeployments are particularly alarming as our industry enters the busiest freight season, with back to school merchandise and the spring and summer cruise seasons quickly coming upon us.

According to CBP's workload staffing model, our nation is short by approximately 3,700 officers system wide, well below where the security and freight and passenger facilitation apparatus needs to be. Any reduction in CPB resources hits the maritime industry particularly hard. In FY 2015, when CBP was funded to hire 2,000 additional staff, fewer than 20 agents were assigned to seaports, and those were only for passenger terminals. AAPA has been a strong, consistent and vocal advocate for the need to increase CBP staffing resources at a minimum of 600 CBP staff above attrition annually.

Last week, the CBP Office of Trade told stakeholders that 300 CBP staff will be redeployed by May 2. To put this in perspective, Congress appropriated 600 new CBP staff in the FY 2019 Homeland Security Appropriations bill. At this current pace, these redeployments would wipe out half the FY 2019 progress made in addressing CBP staffing shortfalls. Looking ahead, the maritime industry has several questions about the redeployment process:

1. How are the assignments of temporary redeployments being determined?
2. Will there be coordination with the ports or terminals on workload conditions and needs as we enter seasonal freight and passenger surges?
3. How will temporary redeployments be backfilled?
4. How long will these temporary redeployments take place?
5. Will overtime contracts be impacted?
6. Will ports be asked to pay for additional staff hours?

Seaport activity supports nearly 31 million American jobs and accounts for over a quarter of the nation's economy. The safe and efficient movement of freight and people are vital to the security of our nation and maintaining a strong economy. Even without the threat of insufficient CBP staff during the busy seasons, our seaports and maritime industry are still in dire need of CBP staffing resources. Nowhere is the need for a sustainable and robust CBP workforce more apparent than at our nation's seaports. Each year, roughly 1.2 billion metric tons of foreign trade cargo including more than 26 million cargo containers arrive at our seaports, and over 12 million international passengers begin their cruises via U.S. seaports.

CBP is an important partner in the operations of seaports. We look forward to hearing from you on how we can best address the continued CBP staffing crisis, while continuing to secure and facilitate freight and passengers through our nation's seaports.

Sincerely



Kurt Nagle
President & CEO

cc: Mr. John Sanders, CBP
Mr. Robert Perez, CBP
Mr. Todd Owen, CBP
Mr. John Wagner, CBP
Mr. Randy Howe, CBP
Mr. Todd Hoffman, CBP
The Honorable Nancy Pelosi, Speaker, U.S. House of Representatives
The Honorable Kevin McCarthy, Minority Leader, U.S. House of Representatives
The Honorable Mitch McConnell, Majority Leader, U.S. Senate
The Honorable Charles Schumer, Minority Leader, U.S. Senate